

Appl. No.: 09/309,372  
Amendment dated May 17, 2005  
Reply to Office Action mailed March 9, 2005

### **REMARKS/ARGUMENTS**

The office action mailed March 9, 2005, has been carefully reviewed and these remarks are responsive to that office action. Reconsideration and allowance of this application are respectfully requested.

Claims 1-14 remain in the application. Claims 1-5 were rejected under 35 USC 103(a) as being unpatentable over Heiny (U.S. Patent 5,778,356) in view of Mullaney (U.S. Patent 5,917,484). Claims 6-14 were rejected under 35 USC 103(a) as being unpatentable over Heiny. Claims 1, 6, and 14 are currently amended.

Claim 1 recites a computer-readable medium having computer-executable instructions for performing steps comprising: allowing a user to select a language in which at least a portion of an electronic file is to be displayed; receiving the electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a unique meaning regardless of the language in which said each phrase is expressed; at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user; and displaying to the user the second plurality of phrases that are expressed in the language selected by the user.

In contrast to the invention as recited in claim 1, Heiny discloses a client-server system in which a server computer performs server-side translation of knowledge-base data before sending the data to a user's client computer for display to the user. Heiny discloses a database management system that allows various users to simultaneously access data in a knowledge base in different languages. (Col. 2, lines 62-65). The system provides users with remote access to a

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knowledge base server over a network such as the Internet using executable content in a Java enabled client based HTML interpreter or browser application. (Col. 3, lines 9-14). The server 132 (Figure 4 and col. 8, lines 6-9) uses data structures with pointers and language handles to access knowledge-base information in a language specified by the user. The server then provides the information to the user's client computer for display to the user. Accordingly, Heiny teaches server-side localization (i.e., language translation), not client-side localization of knowledge-base data.

Heiny and Mullaney, either alone or in combination, do not disclose receiving an electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a unique meaning regardless of the language in which said each phrase is expressed. With the exception of initially displaying the names of various languages in each respective language, such as "English," "Duetsch," and "Espanol," Heiny teaches transmission of knowledge-base data expressed in a single user-selected language at any particular time. Heiny does not teach or suggest transmission from a server to a client of a single electronic file containing a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a unique meaning regardless of the language in which said each phrase is expressed.

Mullaney discloses techniques for configuring a computer's "system locale," which is made up of a language, a territory, and a code set. Mullaney teaches displaying the phrase "Select your language" in multiple languages. The computer then awakes, upon restart, with its system locale set according to the language selected by the user. (Col. 3, lines 31-39).

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Mullaney does not teach or suggest "a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a unique meaning regardless of the language in which said each phrase is expressed." Mullaney teaches a single phrase (i.e., "Select your language") expressed in multiple languages. (Col. 4, lines 18-20). Accordingly, the phrase "Select your language" and each of this phrase's foreign-language translations disclosed by Mullaney do not have a unique meaning regardless of the language in which each phrase is expressed. Mullaney does not, therefore, teach or suggest "a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a unique meaning regardless of the language in which said each phrase is expressed."

Heiny and Mullaney, either alone or in combination, also do not teach or suggest selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user. As previously discussed, Heiny teaches server-side localization (i.e., language translation), not client-side localization of data. And as previously discussed, Heiny and Mullaney do not teach or suggest receiving an electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a unique meaning regardless of the language in which said each phrase is expressed. Consequently, Heiny and Mullaney also do not teach or suggest selecting a second plurality of phrases from such a first plurality of phrases.

The invention as recited in claim 1 provides significant advantages over the prior art of record by allowing a user to select a language in which at least a portion of an electronic file

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should be displayed to the user, without requiring any additional downloads of any additional electronic files. In this way, separate electronic files that are stored at separate locations are not needed thereby reducing the amount of data that needs to be stored and the amount of network traffic needed for displaying the electronic document in a language selected by the user.

Accordingly, Heiny and Mullaney, either alone or in combination, fail to establish prima facie obviousness of the invention of claim 1 because Heiny and Mullaney fail to teach or suggest: (1) receiving an electronic file at the user's computer, wherein the electronic file's content includes a plurality of phrases, wherein each phrase of the plurality of phrases is expressed in a plurality of languages and has a unique meaning regardless of the language in which said each phrase is expressed; and (2) at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user, as recited in claim 1.

Claim 6 recites a method of providing an electronic file to a user comprising the steps of: assigning to at least one word in the electronic file a plurality of identifiers, wherein each identifier corresponds to one of a plurality of respective translations in the electronic file for said at least one word; and at a receiving computer: receiving the electronic file from a sending computer, allowing the user to select a language in which at least a portion of the electronic file is to be displayed, using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, inserting the translation obtained from the electronic file into a translated electronic file, and displaying the translated electronic file to the user.

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In contrast to the invention as recited in claim 6, Heiny discloses server-side localization (i.e., language translation) of knowledge-base data, which is sent to a user's client computer for display to the user. Heiny, therefore, does not teach or suggest client-side localization by performing the following steps at a receiving computer: (1) using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, and (2) inserting the translation obtained from the electronic file into a translated electronic file. For at least these reasons, Heiny fails to establish prima facie obviousness of the invention of claim 6.

Claim 14 recites a method of displaying at least a portion of a document in a language selected by a user, said method comprising the steps of: assigning to a plurality of words in the document a plurality of identifiers, wherein each identifier corresponds to a respective one of a plurality of translations for said plurality of words; and at a receiving computer: (1) receiving the document from a sending computer, (2) allowing a user to select a language in which the document is to be displayed, (3) using an identifier from the plurality of identifiers to select a translation from the plurality of translations for said plurality of words, based upon the language selected by the user, (4) replacing the plurality of words in the document by inserting into the document the selected plurality of respective translations for the plurality of words, and (5) displaying the document to the user.

In contrast to the invention as recited in claim 14, Heiny discloses server-side localization (i.e., language translation) of knowledge-base data, which is sent to a user's client computer for display to the user. Accordingly, Heiny does not teach or suggest performing the following two

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steps at the receiving computer: (1) using an identifier from the plurality of identifiers to select a translation from the plurality of translations for said plurality of words, based upon the language selected by the client, and (2) replacing the plurality of words in the document by inserting into the document the selected plurality of respective translations for the plurality of words. For at least these reasons, Heiny fails to establish prima facie anticipation or obviousness of the invention of claim 14.

Claims 2-5 and 7-13 properly depend upon claims 1 and 6, respectively. Therefore, these dependent claims are in condition for allowance for at least the reasons discussed above in connection with claims 1 and 6.

### CONCLUSION

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicant respectfully submits that this application is in condition for allowance, and respectfully requests issuance of a notice of allowance.

Respectfully submitted,

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